

EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

FRANKLIN ISRAEL BECKMAN, individually and a
administrator and/or executor on behalf of the Estate of
Stella Beckman,

Plaintiff,

- against -


ALLSTATE INSURANCE COMPANY,

Defendant.

Index # 703590/14
Date Filed: May 27, 2014
Plaintiff designates Queens
County as the place of trial.
The basis of the venue is
Plaintiff's place of residence

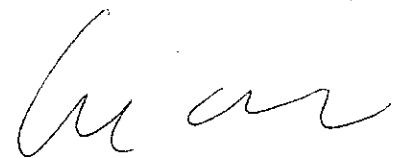
SUMMONS

Plaintiff's residence is at
50-19 175th Place
Fresh Meadows, NY 11365

To the above named Defendant:

You are hereby summoned to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the plaintiff's attorneys within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: New York, New York
May 23, 2014


CRAIG A. BLUMBERG
LAW OFFICE OF CRAIG A. BLUMBERG
Attorneys for Plaintiff
Office and Post Office Address
15 Maiden Lane, 20th Floor
New York, NY 10038-4003
(212) 346-0808

Defendant's Address
for Service of Process:
Allstate Insurance Company
New York Department of Financial Services
1 State Street
New York, NY 10004

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

FRANKLIN ISRAEL BECKMAN, individually and as
administrator and/or executor on behalf of the Estate of
Stella Beckman,

Index #

Plaintiff,

COMPLAINT

- against -

ALLSTATE INSURANCE COMPANY,

Defendant.

Plaintiff, FRANKLIN ISRAEL BECKMAN, individually and as administrator and/or
executor on behalf of the Estate of Stella Beckman, by his attorneys, the LAW OFFICE OF CRAIG
A. BLUMBERG, as and for his complaint against defendant ALLSTATE INSURANCE
COMPANY, sets forth as follows:

1. Plaintiff, FRANKLIN ISRAEL BECKMAN, is an individual over the age of
eighteen years and is the administrator and/or executor and heir of the Estate of Stella Beckman,
residing at 50-19 175th Place, Fresh Meadows, New York.

2. Defendant ALLSTATE INSURANCE COMPANY, ("ALLSTATE") was and
is an Illinois corporation authorized to conduct the business of insurance in the State of New York
whose agent for the process of service is in the County of New York.

3. Prior to June 1, 2013, defendant ALLSTATE issued to Stella Beckman as its
insured its policy #000043923169 (the "Policy"), wherein and whereby it insured against all risks
of loss for property located at 50-19 175th Place, Fresh Meadows, New York (the "Premises"). The
Policy insured against loss to building, contents and additional living expenses up to 12 months.

4. Plaintiff, FRANKLIN ISRAEL BECKMAN, is the son of Stella Beckman, and the only surviving child and heir.

5. Stella Beckman died on February 27, 2001.

6. The Policy was renewed yearly before and after the death of Stella Beckman.

7. After the death of Stella Beckman, plaintiff FRANKLIN ISRAEL BECKMAN continued to pay the premiums for the Policies in effect up through and including January 18, 2014.

8. In accordance with the laws of the State of New York, the premises was inherited by plaintiff, FRANKLIN ISRAEL BECKMAN.

9. The one hundred percent fee interest owner of the premises is therefore plaintiff, FRANKLIN ISRAEL BECKMAN.

10. On or about January 18, 2014, while the Policy was in full force and effect the plaintiff, FRANKLIN ISRAEL BECKMAN suffered a loss as a result of a fire to the dwelling and contents at the Premises in the amount of at least \$350,014.17 and \$67,300.54 respectively and additional living expenses to be determined for a total loss of at least \$417,314.71.

11. Defendant ALLSTATE was timely notified of the loss.

FIRST CAUSE OF ACTION

12. Defendant ALLSTATE has failed and refused to pay plaintiff's claim.

13. Defendant ALLSTATE thereby breached its contract of insurance.

14. By reason thereof, plaintiff, FRANKLIN ISRAEL BECKMAN, has been damaged by such breach in the amount of at least \$417,314.71 for loss to building and contents at the Premises and additional living expenses, to be determined.

SECOND CAUSE OF ACTION

15. By mutual mistake and inadvertence, the named insured referred to in the policy on the date of the loss was Stella Beckman.

16. The incorrect named insured was the result of a mutual mistake on the part of the parties.

17. At all times while the Policy was in effect, defendant ALLSTATE intended to cover the risk Premises known as 50-19 175th Place, Fresh Meadows, New York.

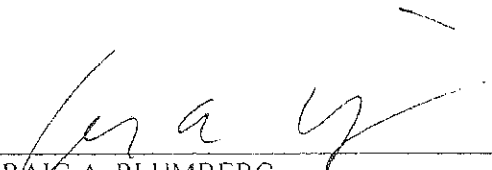
18. As a result of this mistake, and defendant's intent to cover the risk, the policy must be reformed so that the named insured is FRANKLIN ISRAEL BECKMAN as of the renewal of the policy immediately after the death of Stella Beckman on February 27, 2001, and continuing with all subsequent renewals through and including the date of loss of January 18, 2014.

19. Defendant ALLSTATE has refused to issue payment to plaintiff, FRANKLIN ISRAEL BECKMAN, for the fire loss of January 18, 2014.

20. By reason thereof, plaintiff, FRANKLIN ISRAEL BECKMAN has been damaged in the amount of at least \$417,314.71 for loss to building and contents at the Premises and additional living expenses, to be determined.

WHEREFORE, plaintiff, FRANKLIN ISRAEL BECKMAN , demands judgment against defendant, ALLSTATE INSURANCE COMPANY in the amount of at least \$417,314.71 for loss to building and contents at the Premises and additional living expenses to be determined., with interest from January 18, 2014, together with such costs, disbursements, consequential damages, and other and further relief as is appropriate in this action.

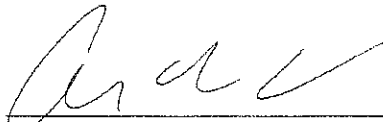
Dated: New York, New York
May 23, 2014



CRAIG A. BLUMBERG
LAW OFFICE OF CRAIG A. BLUMBERG
Attorneys for Plaintiff
Fifteen Maiden Lane, 20th Floor
New York, NY 10038
(212) 346-0808

NYCRR 130-1.1 CERTIFICATION

CRAIG A. BLUMBERG, affirms under the penalties of perjury, that I have no knowledge that the substance of this submission is false, and that the contentions are not frivolous as defined in subsection (c) of section 130-1.1.

A handwritten signature in dark ink, appearing to read 'C. Blumberg', is written over a horizontal line.

CRAIG A. BLUMBERG
LAW OFFICE OF CRAIG A. BLUMBERG
Fifteen Maiden Lane, 20th Floor
New York, New York 10038
(212) 346-0808

Index No.:

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

FRANKLIN ISRAEL BECKMAN, individually and as administrator
and/or executor on behalf of the Estate of Stella Beckman,

Plaintiffs,

-against-

ALLSTATE INSURANCE COMPANY,

Defendant.

SUMMONS AND COMPLAINT

LAW OFFICE OF CRAIG A. BLUMBERG
Attorneys for Plaintiff

Office & P.O. Address
Fifteen Maiden Lane, 20th Floor
New York, New York 10038
(212) 346-0808